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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CALDER SEACARRIER CORP.,

07 CV 6520 (LAK)

Plaintiff,

- against -

VIKING MARINE S.A. and SINORCHES GLOBAL LTD. a/k/a/ SGL SHIPPING LIMITED,

Defendants.

-----X

NOTICE OF MOTION

MOTION BY:

William R. Bennett, III
Bennett, Giuliano, McDonnell & Perrone, LLP
225 West 34th Street, Suite 402
New York, New York 10122
(646) 328-0120
(646) 328-0121 (Fax)

DATE and TIME:

Pursuant to Court Order.

PLACE:

United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SUPPORTING PAPERS:

1. Memorandum of Law

RELIEF DEMANDED:

1. Dismiss Complaint for failure to state a cause of action.
2. Summary Judgment on issue of standing.

Dated: New York, New York
December 26, 2007

Bennett, Giuliano, McDonnell & Perrone, LLP
Attorneys for Defendant Sinoriches Global, Ltd.



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TO: Garth Wolfson, Esq.
Mahoney & Keane LLP
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CERTIFICATE OF SERVICE

I, WILLIAM R. BENNETT, III, an attorney duly admitted to practice in the Courts of the State of New York and in this District, hereby certify that on December 26, 2007, I personally caused a copy of the foregoing NOTICE OF MOTION to be served on defendants:

Garth Wolfson, Esq.
Mahoney & Keane LLP
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New York, New York 10006

Richard M. Ziccardi, Esq.
Xylas & Ziccardi, LLP
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by depositing a true copy of same enclosed in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.



William R. Bennett, III